

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

THE HILLMAN GROUP, INC.,

Plaintiff,

V.

KEYME, INC.,

Defendant.

Civil Action No. 2:19-cv-00209

JURY TRIAL DEMANDED

**AGREED JOINT MOTION FOR LIMITED VENUE DISCOVERY
AND EXTENSION OF BRIEFING DEADLINES**

This agreed Joint Motion is made by and between Plaintiff The Hillman Group, Inc. (“Hillman”) and Defendant KeyMe, LLC (“KeyMe”):

WHEREAS, Hillman filed the Complaint in this Action (D.I. 1) on June 3, 2019;

WHEREAS, KeyMe filed a Sealed Motion to Dismiss for Improper Venue or, in the Alternative, to Transfer to the Southern District of New York (D.I. 12/13/16), as well as a Motion to Transfer Venue to the Southern District of New York Under 28 U.S.C. § 1404 (D.I. 14) (collectively, “KeyMe’s Motions”) on July 25, 2019;

WHEREAS, Hillman's deadline to respond to KeyMe's Motions is presently August 8, 2019;

WHEREAS, Hillman and KeyMe each seek to serve interrogatories, requests for production, and one (1) Rule 30(b)(6) deposition notice containing approximately 5 topics (the “Venue Discovery”) targeted to the venue issues; and

WHEREAS, the parties seek to minimize the burden on the Court and ensure the just, speedy, and inexpensive determination of their present dispute;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties, by and through their undersigned counsel, and subject to approval of the Court, that:

1. Hillman may serve 5 interrogatories and 5 requests for production for the purposes of Venue Discovery;
2. KeyMe may serve 3 interrogatories and 3 requests for production for the purposes of Venue Discovery;
3. Hillman and KeyMe will serve the Venue Discovery on the other party within three (3) calendar days of the filing of this agreed Joint Motion;
4. The parties will serve responses and responsive documents and things to the Venue Discovery on the other party within twenty (20) calendar days of being served with the Venue Discovery;
5. The Rule 30(b)(6) depositions will be held within fourteen (14) calendar days of the service of the respective responses and responsive documents at a mutually agreeable location, for a maximum of four (4) hours each; and
6. Hillman's Oppositions to KeyMe's Motions will be due fourteen (14) calendar days after the date of the last of the Rule 30(b)(6) depositions.

Dated: August 5, 2019

/s/Eric H. Findlay
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CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. This document will be served on all counsel of record in accordance with the Federal Rules of Civil Procedure.

/s/ Eric H. Findlay
Eric H. Findlay